



Certificate of Analysis

Number: 6030-25010237-001A

Artesia Laboratory

200 E Main St.

Artesia, NM 88210

Phone 575-746-3481

Chandler Montgomery
Occidental Petroleum
1502 W Commerce Dr.
Carlsbad, NM 88220

Field: PERMIAN_RESOURCES
Station Name: Sand Dunes CTB Check
Station Number: 17000C
Station Location: OP-L0901-BT002
Sample Point: Meter
Property ID: FMP/LSE NM40659
Formation: NEW_MEXICO
County:
Well Name: CTB
Type of Sample: Spot-Cylinder
Sampling Company: SPL - OXY
Heat Trace Used: N/A
Last Inst. Cal.: 01/13/2025 08:04:58
Analyzed: 01/15/2025 11:37:09 by CDW

Report Date: 01/19/2025
Sampled By: CG
Sample Of: Gas
Sample Type: Spot
Sample Conditions: 125 psig, @ 62 °F Ambient: 43 °F
Sample Date: 01/13/2025 01:45
Received Date: 01/14/2025
Login Date: 01/14/2025
Effective Date: 01/01/2025
Flow Rate: 34819 MSCFD
Sampling Method: Purge/Fill Vacuum
Heating Method:
Method: GPA-2261M
Cylinder No: 9999-005126
Instrument: 70142339 (Inficon GC-MicroFusion)

Analytical Data

Components	Un-normalized Mol %	Mol. %	Wt. %	GPM at 14.65 psia	
Hydrogen Sulfide	0.0000	0.0000	0.0000		GPM TOTAL C2+
Nitrogen	1.2226	1.2114	1.5246		GPM TOTAL C3+
Methane	75.4281	74.7368	53.8641		GPM TOTAL iC5+
Carbon Dioxide	0.6516	0.6456	1.2764		
Ethane	12.3989	12.2852	16.5957	3.280	
Propane	6.3610	6.3027	12.4858	1.733	
Iso-butane	0.9604	0.9516	2.4848	0.311	
n-Butane	2.2123	2.1920	5.7237	0.690	
Iso-pentane	0.5013	0.4967	1.6100	0.181	
n-Pentane	0.5305	0.5256	1.7036	0.190	
Hexanes Plus	0.6584	0.6524	2.7313	0.284	
	100.9251	100.0000	100.0000	6.669	

Calculated Physical Properties	Total	C6+
Relative Density Real Gas	0.7714	3.2176
Calculated Molecular Weight	22.26	93.19
Compressibility Factor	0.9960	
GPA 2172 Calculation:		
Calculated Gross BTU per ft³ @ 14.65 psia & 60°F		
Real Gas Dry BTU	1309	5113
Water Sat. Gas Base BTU	1287	5024
Ideal, Gross HV - Dry at 14.65 psia	1303.6	5113.2
Ideal, Gross HV - Wet	1280.8	5023.7
Net BTU Dry Gas - real gas	1189	
Net BTU Wet Gas - real gas	1169	

Comments: H2S Field Content: 0 %

Mostaq Ahmmed

Hydrocarbon Laboratory Manager

Quality Assurance: The above analyses are performed in accordance with ASTM, UOP, GPA guidelines for quality assurance, unless otherwise stated. The test results apply to the sample as received.

**UPSET VENTING EVENT SPECIFIC JUSTIFICATIONS FORM****Facility Id#** fAPP2127048458**Facility:** Sand Dunes South Corridor CTB**Duration of Event:** 24 Hours**Start Time:** 12:00 AM**Cause:** Equipment Malfunction > VCU > Flash Process Fire**Method of Vented Gas Measurement:** Allocated Calculation**Operator:** OXY USA, Inc.**Vent Date:** 07/06/2025**MCF Vented:** 188**End Time:** 11:59 PM**1. Reason why this event was beyond Operator's control:**

This emissions event was caused by the unforeseen, unexpected, sudden, and unavoidable breakdown of equipment or process that was beyond the owner/operator's control and did not stem from activity that could have been foreseen and avoided, and could not have been avoided by good design, operation, and preventative maintenance practices. Oxy engages in respectable and good facility operation practices while also maintaining its continuous facility equipment preventative maintenance program. In this situation, venting occurred due to a brief flash process fire in VCU unit #1 on July 4, 2025. During scheduled preventative maintenance, fluids were cleared from the suction piping, and applicable pressure was observed at the tank pit. The suction valve was fully opened, allowing fluid behind the valve to migrate to the burner pilot, which resulted in a flash process fire. The fire was extinguished when the inlet was closed. Following the incident, the VCU remained offline due to burnt wires and pending repairs. With VCU unit #1 shut down, pressure increased in the water tanks, leading to venting through the Enardo hatches. While venting is not OXY's primary approach for addressing or rectifying sudden and unexpected malfunctions, it was essential to maintain operational and equipment safety until the issue could be resolved expeditiously. This event is out of OXY's control yet OXY made every effort to control and minimize emissions as much as possible by working safely and diligently.

2. Steps Taken to limit duration and magnitude of venting or flaring:

While venting is not OXY's primary approach for addressing or rectifying malfunctions, it was essential to maintain operational and equipment safety until the issue could be resolved expeditiously. In this situation, venting occurred due to a brief flash process fire in VCU unit #1 on July 4, 2025. During scheduled preventative maintenance, fluids were cleared from the suction piping, and applicable pressure was observed at the tank pit. The suction valve was fully opened, allowing fluid behind the valve to migrate to the burner pilot, which resulted in a flash process fire. The fire was extinguished when the inlet was closed. Following the incident, the VCU remained offline due to burnt wires and pending repairs. With VCU unit #1 shut down, pressure increased in the water tanks, leading to venting through the Enardo hatches. While venting is not OXY's primary approach for addressing or rectifying malfunctions, it was essential to maintain operational and equipment safety until the issue could be resolved expeditiously. This event is out of OXY's control yet OXY made every effort to control and minimize emissions as much as possible.

3. Corrective Actions taken to eliminate the cause and reoccurrence of venting or flaring:

Oxy is limited in the corrective actions available to them to eliminate the cause and potential reoccurrence of VCU malfunctions as notwithstanding VCU engine design and operation, VCU's are inherently dynamic and even the smallest alarms, false or true, can be sudden, reasonably unforeseeable and unexpected which can cause malfunctions to occur. Oxy continually strives to maintain and operate all its equipment in a manner consistent with good practices for minimizing emissions and reducing the number of emission events. Oxy has a strong and positive equipment preventative maintenance program in place.

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

DEFINITIONS

Action 487199

DEFINITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 487199
	Action Type: [C-129] Venting and/or Flaring (C-129)

DEFINITIONS

For the sake of brevity and completeness, please allow for the following in all groups of questions and for the rest of this application: • this application's operator, hereinafter "this operator"; • venting and/or flaring, hereinafter "vent or flare"; • any notification or report(s) of the C-129 form family, hereinafter "any C-129 forms"; • the statements in (and/or attached to) this, hereinafter "the statements in this"; • and the past tense will be used in lieu of mixed past/present tense questions and statements.

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QUESTIONS

Action 487199

QUESTIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 487199
	Action Type: [C-129] Venting and/or Flaring (C-129)

QUESTIONS

Prerequisites <i>Any messages presented in this section, will prevent submission of this application. Please resolve these issues before continuing with the rest of the questions.</i>	
Incident Well	Unavailable.
Incident Facility	[fAPP2127048458] Sand Dunes South Corridor CTB

Determination of Reporting Requirements <i>Answer all questions that apply. The Reason(s) statements are calculated based on your answers and may provide additional guidance.</i>	
Was this vent or flare caused by an emergency or malfunction	Yes
Did this vent or flare last eight hours or more cumulatively within any 24-hour period from a single event	Yes
Is this considered a submission for a vent or flare event	Yes, minor venting and/or flaring of natural gas.
<i>An operator shall file a form C-141 instead of a form C-129 for a release that, includes liquid during venting and/or flaring that is or may be a major or minor release under 19.15.29.7 NMAC.</i>	
Was there at least 50 MCF of natural gas vented and/or flared during this event	Yes
Did this vent or flare result in the release of ANY liquids (not fully and/or completely flared) that reached (or has a chance of reaching) the ground, a surface, a watercourse, or otherwise, with reasonable probability, endanger public health, the environment or fresh water	No
Was the vent or flare within an incorporated municipal boundary or within 300 feet from an occupied permanent residence, school, hospital, institution or church in existence	No

Equipment Involved	
Primary Equipment Involved	Other (Specify)
Additional details for Equipment Involved. Please specify	Equipment Malfunction > VCU > Flash Process Fire

Representative Compositional Analysis of Vented or Flared Natural Gas <i>Please provide the mole percent for the percentage questions in this group.</i>	
Methane (CH4) percentage	75
Nitrogen (N2) percentage, if greater than one percent	1
Hydrogen Sulfide (H2S) PPM, rounded up	0
Carbon Dioxide (CO2) percentage, if greater than one percent	1
Oxygen (O2) percentage, if greater than one percent	0
<i>If you are venting and/or flaring because of Pipeline Specification, please provide the required specifications for each gas.</i>	
Methane (CH4) percentage quality requirement	Not answered.
Nitrogen (N2) percentage quality requirement	Not answered.
Hydrogen Sulfide (H2S) PPM quality requirement	Not answered.
Carbon Dioxide (CO2) percentage quality requirement	Not answered.
Oxygen (O2) percentage quality requirement	Not answered.

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QUESTIONS, Page 2

Action 487199

QUESTIONS (continued)

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	Action Type: [C-129] Venting and/or Flaring (C-129)

QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	07/06/2025
Time vent or flare was discovered or commenced	12:00 AM
Time vent or flare was terminated	11:59 PM
Cumulative hours during this event	24

Measured or Estimated Volume of Vented or Flared Natural Gas	
Natural Gas Vented (Mcf) Details	Cause: Other Other (Specify) Natural Gas Vented Released: 188 Mcf Recovered: 0 Mcf Lost: 188 Mcf.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Additional details for Measured or Estimated Volume(s). Please specify	Allocated Vent Calculation
Is this a gas only submission (i.e. only significant Mcf values reported)	Yes, according to supplied volumes this appears to be a "gas only" report.

Venting or Flaring Resulting from Downstream Activity	
Was this vent or flare a result of downstream activity	No
Was notification of downstream activity received by this operator	Not answered.
Downstream OGRID that should have notified this operator	Not answered.
Date notified of downstream activity requiring this vent or flare	Not answered.
Time notified of downstream activity requiring this vent or flare	Not answered.

Steps and Actions to Prevent Waste	
For this event, this operator could not have reasonably anticipated the current event and it was beyond this operator's control.	True
Please explain reason for why this event was beyond this operator's control	This emissions event was caused by the unforeseen, unexpected, sudden, and unavoidable breakdown of equipment or process that was beyond the owner/operator's control and did not stem from activity that could have been foreseen and avoided, and could not have been avoided by good design, operation, and preventative maintenance practices. Oxy engages in respectable and good facility operation practices while also maintaining its continuous facility equipment preventative maintenance program. In this situation, venting occurred due to a brief flash process fire in VCU unit #1 on July 4, 2025. During scheduled preventative maintenance, fluids were cleared from the suction piping, and applicable pressure was observed at the tank pit. The suction valve was fully opened, allowing fluid behind the valve to migrate to the burner pilot, which resulted in a flash process fire. The fire was extinguished when the inlet was closed. Following the incident, the VCU remained offline due to burnt wires and pending repairs. With VCU unit #1 shut down, pressure increased in the water tanks, leading to venting through the Enardo hatches. While venting is not OXY's primary approach for addressing or rectifying sudden and unexpected malfunctions, it was essential to maintain operational and equipment safety until the issue could be resolved expeditiously. This event is out of OXY's control yet OXY made every effort to control and minimize emissions as much as possible by working safely and diligently.
	While venting is not OXY's primary approach for addressing or rectifying malfunctions, it was essential to maintain operational and equipment safety until the issue could be resolved expeditiously. In this situation, venting occurred due to a brief flash process fire in VCU unit

Steps taken to limit the duration and magnitude of vent or flare	#1 on July 4, 2025. During scheduled preventative maintenance, fluids were cleared from the suction piping, and applicable pressure was observed at the tank pit. The suction valve was fully opened, allowing fluid behind the valve to migrate to the burner pilot, which resulted in a flash process fire. The fire was extinguished when the inlet was closed. Following the incident, the VCU remained offline due to burnt wires and pending repairs. With VCU unit #1 shut down, pressure increased in the water tanks, leading to venting through the Enardo hatches. While venting is not OXY's primary approach for addressing or rectifying malfunctions, it was essential to maintain operational and equipment safety until the issue could be resolved expeditiously. This event is out of OXY's control yet OXY made every effort to control and minimize emissions as much as possible.
Corrective actions taken to eliminate the cause and reoccurrence of vent or flare	Oxy is limited in the corrective actions available to them to eliminate the cause and potential reoccurrence of VCU malfunctions as notwithstanding VCU engine design and operation, VCU's are inherently dynamic and even the smallest alarms, false or true, can be sudden, reasonably unforeseeable and unexpected which can cause malfunctions to occur. Oxy continually strives to maintain and operate all its equipment in a manner consistent with good practices for minimizing emissions and reducing the number of emission events. Oxy has a strong and positive equipment preventative maintenance program in place.

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ACKNOWLEDGMENTS

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ACKNOWLEDGMENTS

☒	I acknowledge that I am authorized to submit a <i>Venting and/or Flaring</i> (C-129) report on behalf of this operator and understand that this report can be a complete C-129 submission per 19.15.27.8 and 19.15.28.8 NMAC.
☒	I acknowledge that upon submitting this application, I will be creating a new incident file (assigned to this operator) to track any C-129 forms, pursuant to 19.15.27.7 and 19.15.28.8 NMAC and understand that this submission meets the notification requirements of Paragraph (1) of Subsection G and F respectively.
☒	I hereby certify the statements in this report are true and correct to the best of my knowledge and acknowledge that any false statement may be subject to civil and criminal penalties under the Oil and Gas Act.
☒	I acknowledge that the acceptance of any C-129 forms by the OCD does not relieve this operator of liability should their operations have failed to adequately investigate, report, and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment.
☒	I acknowledge that OCD acceptance of any C-129 forms does not relieve this operator of responsibility for compliance with any other applicable federal, state, or local laws and/or regulations.

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CONDITIONS

Action 487199

CONDITIONS

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	Action Number: 487199
	Action Type: [C-129] Venting and/or Flaring (C-129)

CONDITIONS

Created By	Condition	Condition Date
marialuna2	If the information provided in this report requires an amendment, submit a [C-129] Amend Venting and/or Flaring Incident (C-129A), utilizing your incident number from this event.	7/21/2025